

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION OF CINCINNATI**

IN RE: : CASE NO. 23-11308
:
RYAN ANTHONY PRESTON TODD : CHAPTER 7
:
: JUDGE BETH A BUCHANAN
DEBTOR. :

**MOTION OF PATRICIA J. FRIESINGER OF COOLIDGE WALL CO., L.P.A. TO
WITHDRAW AS COUNSEL FOR DEBTOR RYAN ANTHONY PRESTON TODD
COMBINED WITH NOTICE HEREOF**

PLEASE READ THIS NOTICE CAREFULLY

You are hereby notified that the Debtor has filed papers with the Court requesting an Order granting the Debtor's Motion, Application or Objection (hereinafter called the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion, or if you want the Court to consider your views on the Trustee's Motion, then on or before Twenty-One (21) days after the Date of Issuance set forth below (the "Deadline"), you or your attorney must file a written response in accordance with the Court's local rules and filing procedures.

The Clerk of Court's address is: U.S. Bankruptcy Court Clerk's Office, 221 East Fourth Street, Ste. 800, Cincinnati, OH 45202-4133.

Copies of the Court's Administrative Procedures for electronic court filings can be found at the following website: <http://www.ohsb.uscourts.gov>

You must file the response early enough so the Court will **receive** it on or before the Deadline.

You must also provide a copy of your response via mail to Patricia J. Friesinger, Esq., Coolidge Wall Co., L.P.A., 33 West First Street, Dayton, Ohio 45402, Elliott Polaniecki, Chapter 7 Trustee, PO Box 42341, Cincinnati, OH 45242 or through the Court's ECF system.

August 7, 2023

/s/ Patricia J. Friesinger

Date of Issuance

Patricia J. Friesinger

MOTION

NOW COMES Patricia J. Friesinger of Coolidge Wall Co., L.P.A. (“Counsel”), and respectfully moves this Court for leave to withdraw as counsel of record for Debtor Ryan Anthony Preston Todd (the “Debtor”).

Based on grounds contained in Rule 1.16 of the *Ohio Rules of Professional Conduct*, Counsel respectfully requests this honorable Court grant leave for Counsel to withdraw as counsel for the Debtor. Counsel has provided the Debtor with reasonable warning that Counsel would be seeking to withdraw. Further, Counsel has filed a motion to extend and continue all matters that would otherwise come due in the near term to protect the Debtor’s interests and provide sufficient time for the Debtor to obtain replacement counsel.

WHEREFORE, Counsel respectfully respects that she be allowed to withdraw as Counsel for the Debtor.

Respectfully submitted,

/s/ Patricia J. Friesinger

Patricia J. Friesinger (00072807)
33 W. First Street, Suite 200
Dayton, OH 45402
Tel: (937) 449-5776 Fax: (937) 223-6705
E-Mail: trustee@coollaw.com
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing **MOTION OF PATRICIA J. FRIESINGER OF COOLIDGE WALL CO., L.P.A. TO WITHDRAW AS COUNSEL FOR DEBTOR RYAN ANTHONY PRESTON TODD COMBINED WITH NOTICE HEREOF** was served on the following registered ECF participants, **electronically** through the court's ECF system at the email address registered with the court:

- Asst us trustee (cin) ustpregion09.ci.ecf@usdoj.gov
- Patricia J Friesinger friesinger@coollaw.com, trustee@coollaw.com
- Elliott Polaniecki elliottp@cinci.rr.com, epolaniecki@ecf.axosfs.com

Via regular U.S. Mail, postage prepaid, to the parties in interest on the attached Matrix and listed below on the date of filing.

Ryan Anthony Preston Todd
8120 State Route 28
Leesburg, OH 45135

Bridgecrest Acceptance Corporation
AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

/s/ Patricia J. Friesinger

Patricia J. Friesinger

Label Matrix for local noticing

AT&T

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Air Methods Corporation

0648-1

PO Box 537104

5500 S Quebec St

Case 1:23-bk-11308

Atlanta, GA 30353-7104

Suite 300

Southern District of Ohio

Englewood, CO 80111-1926

Cincinnati

Wed Jul 26 11:58:11 EDT 2023

Asst US Trustee (Cin)

Bridgecrest Acceptance Corporation

Butler County Common Pleas Court

Office of the US Trustee

AIS Portfolio Services, LLC

315 High Street

J.W. Peck Federal Building

4515 N Santa Fe Ave. Dept. APS

Hamilton, OH 45011-6085

550 Main Street, Suite 4-812

Oklahoma City, OK 73118-7901

Cincinnati, OH 45202-5212

Carvana

Emergency Medicine Specia

Erie Constrution Mid-West, LLC

1930 W Rio Salado Pkwy

3131 Newmark Dr.

3520 Sudachi Drive

Tempe, AZ 85281-2361

#210

Dayton, OH 45414-2435

Miamisburg, OH 45342-5400

Patricia J Friesinger

Highland County Common Pleas

I C Systems

Coolidge Wall Co., L.P.A.

105 N High St

PO Box 64378

33 West First Street, Suite 600

Hillsboro, OH 45133-1076

Saint Paul, MN 55164-0378

Dayton, OH 45402-1289

Internal Revenue Services

James O'Neil

Jessica L Todd

PO Box 7346

8671 Hawthorne Place

8120 State Route 28

Philadelphia, PA 19101-7346

Springboro, OH 45066-9684

Leesburg, OH 45135-9357

Jessica Todd

Joseph Sprafka

Kemp, Schaeffer & Rowe Co., L.P.A

8120 State Route 28

455 Delta Ave.

88 W Mound St

Leesburg, OH 45135-9357

Suite 108

Columbus, OH 43215-5084

Cincinnati, OH 45226-1170

Kettering Health Network

Kettering Network Radiolo

Matthew Chasar

PO Box 182041

3451 Newmark Dr.

455 Delta Ave.

Columbus, OH 43218-2041

Miamisburg, OH 45342-5426

Suite 108

Cincinnati, OH 45226-1170

Miami Valley Hospital

Morris Home Furniture

Ohio Attorney General

PO Box 713072

2377 Commerce Center Blvd

Collections Enforce. Sec. Attn: Bankr.

Columbus, OH 43271-3072

Fairborn, OH 45324-6378

30 East Broad St., 14th Floor

Columbus, OH 43215-3414

Ohio Department of Taxation

Elliott Polaniecki

Progressive Leasing

PO Box 530

P O Box 42341

5651 W Talavi Blvd

Columbus, OH 43216-0530

Cincinnati, OH 45242-0341

Glendale, AZ 85306-1875

Radiology Physicians Inc.

Springfield Regional

Steve Robertson Trucking LLC

One Wyoming St.

100 Medical Center Dr.

3191 Millville Shandon Rd

Dayton, OH 45409-2722

Springfield, OH 45504-2687

Hamilton, OH 45013-9221

Synchrony Bank

PO Box 960061

Orlando, FL 32896-0061

Ryan Anthony Preston Todd

8120 State Route 28

Leesburg, OH 45135-9357

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Transworld Systems Inc

500 Virginia Dr. Ste. 514

Fort Washington, PA 19034-2733

U.S. Small Business Administration

10737 Gateway West #320

El Paso, TX 79935-4910

United Resource Systems

3501 S. Teller St

Denver, CO 80235-2011

VT Freedom Truck Finance

12221 Merit Drive, Ste. 1175

Dallas, TX 75251-2342

(p)WRIGHT PATT CREDIT UNION

3560 PENTAGON BLVD

BEAVERCREEK OH 45431-2779

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Wright Patt Credit Union

PO Box 286

Fairborn, OH 45324-0286

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Alliance Physicians Speci

(u)Emergency Medicine Physic

End of Label Matrix

Mailable recipients 36

Bypassed recipients 2

Total 38